

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TOP NOTCH SOLUTIONS, INC. and
ROBERT RASHIDI,

Plaintiffs,

vs.

CROUSE AND ASSOCIATES
INSURANCE BROKERS, INC. et al.,

Defendants.

NO. 2:17-CV-00827-JLR-MAT

STIPULATED MOTION AND
~~PROPOSED~~ ORDER FOR
DISMISSAL WITH PREJUDICE OF
PLAINTIFFS' CLAIMS AGAINST
DEFENDANT CROUSE AND
ASSOCIATES INSURANCE
BROKERS, INC. AND OF CROUSE'S
COUNTERCLAIM AGAINST
PLAINTIFFS

Clerk's Action Required

Note on Motion Calendar:
September 10, 2019

I. STIPULATED MOTION

Plaintiffs Top Notch Solutions, Inc., and Robert Rashidi (collectively, "Plaintiffs"), and Defendant Crouse and Associates Insurance Brokers, Inc. ("Defendant") hereby stipulate to the dismissal with prejudice without fees or costs to either party of any and all claims that were brought or could have been brought by Plaintiffs against Crouse. The Parties further stipulate to the dismissal with prejudice without fees or costs of Crouse's counterclaim against Plaintiffs. The claims alleged between Plaintiffs and Crouse have been fully settled by the Parties outside of court, and Crouse may be dismissed from this litigation with prejudice.

STIPULATED MOTION AND [PROPOSED] ORDER FOR
DISMISSAL WITH PREJUDICE OF PLAINTIFFS' CLAIMS
AGAINST DEFENDANT CROUSE AND ASSOCIATES
INSURANCE BROKERS, INC. AND OF CROUSE'S
COUNTERCLAIM AGAINST PLAINTIFFS - NO. 2:17-CV-
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1 The Parties further request that the caption be amended to remove Crouse as a named
2 defendant.

3 The claims against Defendants McGriff, Seibels & Williams, Inc., and the Law Offices of
4 Pucin & Friedland, P.C., remain asserted and active against those Defendants. This Stipulated
5 Dismissal is limited to Crouse only and does not waive or dismiss any claims against the other
6 defendants remaining in this litigation.

7 RESPECTFULLY SUBMITTED this 10th day of September, 2019.

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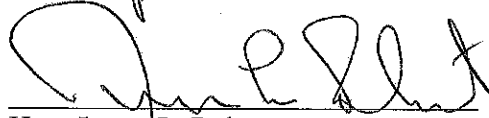
II. ~~PROPOSED~~ ORDER

This matter having come on for hearing upon Plaintiffs Top Notch Solutions, Inc., and Robert Rashidi (collectively, "Plaintiffs"), and Defendant Crouse and Associates Insurance Brokers, Inc. ("Crouse")'s, Stipulated Motion for Dismissal with Prejudice, and this Court being fully advised of the same, it is hereby ORDERED that all claims that were brought or could have been brought by Plaintiffs against Crouse are dismissed with prejudice and without fees or costs to either party.

IT IS FURTHER ORDERED that Crouse's counterclaim against Plaintiffs is hereby dismissed with prejudice and without fees or costs to either party.

As all claims between the Parties are resolved, and no other claims remain, Crouse is hereby dismissed from this litigation with prejudice. The Clerk is directed to amend the Case Caption and remove Crouse as a defendant.

IT IS SO ORDERED on this th 12 day of Sept., 2019.


Hon. James L. Robart

CERTIFICATE OF SERVICE

I, Cynthia Daniel, hereby certify that on September 10, 2019, I electronically filed the following:

- **Stipulated Motion for Dismissal with Prejudice; and**
- **Certificate of Service.**

with the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 10th day of September 2019.

2 BETTS, PATTERSON & MINES P.S.

3
4 By s/Cynthia Daniel

5 Cynthia Daniel
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